

**Optimist Club of Herndon  
Statement of Policy**

**1. Policy Name: **Personally Identifiable Information (PII) Handling and Non-Disclosure****

2. Policy Effective Date:     Initial March 1, 2011  
  Revision January 20, 2013  
  Revision February 10, 2017  
  Revision October 14, 2017  
  Revision November 6, 2023

3. Policy Review Date (or “None”): Annually

4. Policy Expiration Date (or “None”): None

5. Policy Purpose and Objectives:

The purpose of this policy is to ensure that the Optimist Club of Herndon (hereafter referred to as “HOC”) and each of its civic and sports programs implements procedures to protect the Personally Identifiable Information (PII) of HOC Board members and HOC program personnel.

6. Persons and Programs to Which the Policy Applies:

- a. This policy applies to all HOC programs.
- b. This policy applies to and covers the PII of HOC Board members and all HOC program personnel including program managers and assistants, team staff, volunteers, program participants (e.g., players, training attendees, youth game officials), and participants’ parents-guardians.

7. Requirements to Satisfy the Policy:

This policy can be satisfied by implementing (a) and (b) below:

- a. Each HOC program incorporates the HOC-provided PII Handling and Non-Disclosure Agreements for HOC program personnel into its HOC program registration process.
- b. Each HOC program maintains an electronic record of violations of a Handling and Non-Disclosure Agreement, including the identification of the person, the date(s) and scope of the incident(s), the specific action(s) that violated the Agreement, and what action(s) the HOC program took to address the violation(s) and inform persons affected by the violation(s).

8. Assistance and Resources Provided to Execute the Policy:

- a. The HOC will provide the text for PII Handling and Non-Disclosure Agreements to be incorporated into the HOC program registration process.

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- b. A member of the HOC Board or another HOC program's representative will be made available to provide training and assistance on how to implement this policy.

9. Policy Implementation:

- a. As of the effective date of this policy, each HOC program must have the HOC-provided PII Handling and Non-Disclosure Agreements incorporated into its HOC program registration process.
- b. If there is a violation of a PII Handling and Non-Disclosure Agreement, an email must be sent within three (3) days to the HOC Board identifying the person, the date(s) and scope of the incident(s), the specific action(s) that violated the Agreement, and what action(s) they have been taken to address the violation(s) and inform persons affected by the violation(s).

10. Consequences of Failure to Follow the Policy:

- a. If an HOC program or personnel is found to not be in compliance with this policy, the HOC Board will send an email to the HOC Civic or Sports Program Director identifying the problem, the corrective action(s) to be taken, and the timeframe(s) for completing the corrective action(s).
- b. If the HOC program or personnel does not complete the corrective action(s) within the specified timeframe(s), the HOC Board may suspend the HOC program's activities or HOC program personnel until a meeting with the HOC Board takes place and corrective actions are completed.
- c. If necessary, the HOC Board may take legal and (or) law enforcement action(s) to address a violation of the PII Handling and Non-Disclosure Agreement.